

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

RYAN SHINN, individually and on behalf of
all others similarly situated,

Plaintiff,

Case No.: 9:22-cv-80659

v.

R1 RCM INC. d/b/a MEDICAL FINANCIAL
SOLUTIONS,

Defendant.

_____ /

NOTICE OF REMOVAL

Defendant, R1 RCM Inc. d/b/a Medical Financial Solutions (“R1”), by and through its undersigned counsel, and pursuant to 28 U.S.C. §§ 1441, 1446, hereby files its Notice of Removal of this action from the Circuit Court of Palm Beach County, Florida, to the United States District Court for the Southern District of Florida, on the following grounds:

1. On March 29, 2022, Plaintiff, Ryan Shinn (“Plaintiff”), commenced a civil action in the Circuit Court of Palm Beach County, Florida, styled as *Ryan Shinn v. R1 RCM Inc. d/b/a Medical Financial Solutions*, Case No. 50-2022-CA-002834.

2. On April 8, 2022, a copy of the Complaint was served on R1. This Notice of Removal is being filed within thirty days of R1’s receipt through service of Plaintiff’s Complaint and, therefore, under 28 U.S.C. § 1446(b)(1), this Notice of Removal is timely and proper.

3. Additionally, pursuant to 28 U.S.C. § 1446(a), true and legible copies of all process, pleadings, orders, and other papers or exhibits of every kind on file in the state and known to have been served by, or upon R1, are attached hereto as Composite Exhibit “A.” R1 is not aware of any further proceeding in the above-described civil action.

4. This Court possesses original jurisdiction over this matter pursuant to 28 U.S.C. § 1331, as this civil action involves a federal question.

5. Plaintiff alleges that R1 violated the Fair Debt Collection Practices Act, 15 U.S.C. § 1692 *et seq.* (the “FDCPA”). The FDCPA is a law of the United States and, therefore, pursuant to 28 U.S.C. § 1441(a), these claims are removable to this Court.

6. R1 will promptly file the Notice of Filing Notice of Removal attached hereto as Exhibit “B,”¹ with a copy of this Notice of Removal, in the Office of the Clerk of the Circuit Court of Palm Beach County. R1 will also promptly provide a written copy of the Notice of Removal to Plaintiff.

7. R1 has complied with all conditions precedent to the removal of this action.

WHEREFORE, Defendant, R1, respectfully gives notice that the above-described civil action now pending in the Circuit Court of Palm Beach County, Florida, is removed therefrom to this Court.

¹ The exhibit to the Notice of Filing Notice of Removal, consisting of this Notice of Removal, has been omitted from Exhibit B.

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*Attorneys for Defendant, Enhanced Recovery
Company, LLC*

CERTIFICATE OF SERVICE

I hereby certify that on April 28, 2022, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system and caused to be served a true and correct copy of the foregoing via electronic and First Class Mail as follows:

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